

that the government did not seize or attempt to seize the real property located at 4801 Aberdeen Parkway in Amarillo, Texas (“the Real Property”). The remaining statements in Section III are not allegations to which an admission or denial is necessary.

IV.

4. Claimant admits that it has a claim to the Real Property. Claimant denies that Phyllis Buckley has a claim to the Real Property. Claimant is without knowledge or information sufficient to form a belief about whether Phyllis Buckley has a claim to the other property at issue in the Complaint.

V.

5. Claimant denies that the Real Property is subject to forfeiture. Claimant is without knowledge or information sufficient to form a belief about whether the other property at issue in the Complaint is subject to forfeiture.

VI.

For these reasons, Claimant requests that the Real Property be dismissed from this forfeiture action or, in the alternative, that Claimant be reimbursed for all funds invested in the Real Property and costs incurred in connection with the Real Property. Claimant further requests that all costs incurred by the Government in seeking forfeiture of the Real Property be taxed against the Government. Claimant also requests attorneys’ fees and costs expended in this action plus such other relief to which the Claimant may show itself to be justly entitled.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing document was this 2nd day of November 2011 served electronically on all appropriate parties through the court's CM/ECF filing system. In addition, on this day the following parties will be served by U.S. first class mail, postage prepaid:

John De La Garza III
Assistant United States Attorney
1100 Commerce, Third Floor
Dallas, Texas 75242

/s/ Alysia Córdova
Alysia Córdova